

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EASTMAN KODAK COMPANY,)
Plaintiff,)
v.)
RICOH COMPANY, LTD.) Case No. 12-CV-3109 (DLC)
Defendant.)
)

RICOH'S PROPOSED QUESTIONS FOR VOIR DIRE

Defendant Ricoh Company, Ltd. ("Ricoh"), respectfully requests that the Court ask the following voir dire questions to prospective jurors in addition to the Court's standard voir dire. Ricoh respectfully requests that the Court seek additional explanation from jurors who respond "Yes" to the questions below.

1. This case involves Eastman Kodak Company and Ricoh Company, Ltd. Do you believe you have heard anything about this case from any source, including from another person, a press release or the news media?
2. Have you (or has anyone you know) ever been employed by either Kodak or Ricoh?
3. Do you own stock in either Kodak or Ricoh?
4. Have you read or heard anything recently in the news about either Kodak or Ricoh?
5. Do you know any of the following individuals? Willy Shih, John Valenza, Vincent Thomas, Kannan Ramchandran, Shunsuke Kishi, Kiyoshi Kawano, Fumio Urano, Brian

Becker, Kazumichi Eguchi, Edward Fasano, Eisaku Nagaishi, Hiroshi Saji, Tohru Ushida, Edward André, Kenneth Parulski, James Pohlman, Linda Trueblood.

6. Do you know anyone who works for FTI Consulting?
7. Do you know anyone who works for Precision Economics, LLC?
8. Do you know any of the following law firms or attorneys?
 - a. Robert Gunther, Michael Summersgill, Jordan Hirsch, Sarah Petty, Jonathan Woodard, or Claire Superfine of Wilmer, Cutler, Pickering, Hale and Dorr, LLP;
 - b. David Eiseman, Ryan Goldstein, Melissa Baily, or Philip Sternhell, of Quinn Emanuel Urquhart & Sullivan, LLP?
9. Do you have any legal education or training?
10. What is the highest level of education you have finished? If you attended college, do you have a degree? In what field?
11. Are you employed? What is your present or most recent occupation and title? Who is your employer? How long have you worked in that occupation? Did you have any prior occupations?
12. Have you or has any family member ever sued or been sued in a lawsuit? If yes, were you or your family member the plaintiff or defendant and what was the basis of the lawsuit? If the case has been resolved, what was its resolution and were you and your family satisfied or unsatisfied with the resolution. Was there anything in your dealings with the legal system that left you unhappy or unsatisfied?
13. Have you ever given testimony in a lawsuit? If so, please describe the lawsuit and the nature of your participation. Was there anything about the experience that would make it difficult for you to be fair and impartial in this case?

14. Have you ever served as a juror before? When? What type of case was it? Were you the foreperson for the jury? Did you reach a verdict?

15. Have you or a family member ever applied for or been granted a patent?

16. Have you or has anyone close to you experienced a business failure?

17. Have you or has anyone close to you been involved in a bankruptcy? Have you or has anyone close to you been a creditor in a bankruptcy?

18. Do you have any special disability or problem that would make serving as a member of the jury difficult or impossible?

DATED: October 11, 2013.

By: /s/ David Eiseman

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**Admitted pro hac vice*

Counsel for Defendant Ricoh Company, Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT, on the 11th day of October, 2013, I caused the above document to be served on all attorneys of record via electronic mail.

DATED: October 11, 2013

/s/ *Philip C. Sternhell*
Philip C. Sternhell